

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA**

MARTIN J. WALSH,  
SECRETARY OF LABOR  
U.S. DEPARTMENT OF LABOR,

Plaintiff,

v.

PACKERS SANITATION SERVICES, INC.,  
LTD.,

Defendant.

No. CV: 4:22-CV-03246

**DEFENDANT’S EXPEDITED  
UNOPPOSED MOTION TO RESTRICT  
ACCESS TO THE EXHIBITS ATTACHED  
TO MOTION QUASH AND/OR MOTION  
FOR PROTECTIVE ORDER AND FOR  
EXPEDITED RELIEF**

Defendant Packers Sanitation Services, LLC, named in the Complaint (Doc. 1) as Packers Sanitation Services, Inc., Ltd. (“PSSI” or the “Company”), pursuant to NECivR 5.3(c), hereby submits this Expedited Unopposed Motion to Restrict Access to the Exhibits Attached to its Motion to Quash and/or Motion for Protective Order and for Expedited Relief (Doc. 28).

Specifically, the Company requests that that the Court restrict access to the Exhibits at Docket No. 28-3. As reasons therefore, PSSI states that Exhibit D (the U.S. Department of Labor’s November 15, 2022 correspondence to PSSI) and Exhibit E (the Subpoena Duces Tecum served by the Department of Labor to Asure Software, Inc.) contain proprietary or trade secret information in the nature of the location of its customers workplaces that have not been identified on the docket in this matter.

PSSI conferred with the Secretary regarding this motion. The Secretary does not take a position on whether the information in Exhibits D and E is proprietary, but consents to the the exhibits being placed under restricted access because Exhibit D may contain the names of minors.

Dated this 29th day of November, 2022

Respectfully submitted,

/s/ Patrick M. Dalin

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ATTORNEYS FOR DEFENDANT  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that on this 29th day of November, 2022, the foregoing was filed via the Court's Electronic Filing System and service made via the same, to:

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